

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

In re:

Robert Belcher
dba Trimline Boston South Shore Inc.

Chapter 7
Case Number 22-10560-JEB
Honorable Janet E Bostwick

Debtor

MOTION FOR LEAVE OF COURT TO POSTPONE FORECLOSURE SALE
(EMERGENCY DETERMINATION REQUESTED)

NOW COMES, The Bank of New York Mellon formerly known as The Bank of New York as successor Trustee to JPMorgan Chase Bank, N.A., as Trustee for the Certificateholders of Structured Asset Mortgage Investments II Trust 2006-AR4 Mortgage Pass-Through Certificates, Series 2006-AR4 ("Bank of New York") and files the instant motion, in an abundance of caution, requesting leave to the postpone its presently scheduled foreclosure sale. In support, Bank of New York states as follows:

1. On December 22, 2005, Debtor Robert Belcher executed a note to Union Federal Bank of Indianapolis in the original principal amount of \$412,000.00 (the "Note"). The Note was subsequently transferred over to the movant herein.
2. The Note is secured by a mortgage from Debtor Robert Belcher and non-filing Co-Debtor Zarina Belcher to Mortgage Electronic Registration Systems, Inc. dated December 22, 2005 and registered with Suffolk County Registry District of the Land Court as Document Number 713600, as noted on Certificate of Title Number 117651, subsequently assigned to The Bank of New York Mellon formerly known as The Bank of New York as successor Trustee to JPMorgan Chase Bank, N.A., as Trustee for the Certificateholders of Structured Asset Mortgage Investments II Trust 2006-AR4 Mortgage Pass-Through Certificates, Series 2006-AR4 by assignment registered with Suffolk County Registry District of the Land Court as Document

Number 777619 as noted on Certificate of Title Number 117651. The Mortgage is a first mortgage on real property owned by the Debtor and non-filing Co-Debtor known and numbered as 590 Truman Highway a/k/a 590 Truman Parkway, Hyde Park, MA 02136 (the “Property”).

3. On April 27, 2022, the Debtor filed a petition for relief under Chapter 7 of the United States Bankruptcy Code.

4. On the petition filing date, Bank of New York had a foreclosure sale with respect to the Property scheduled for April 29, 2022. Due to the filing of the instant case, the foreclosure was postponed to June 13, 2022. It was subsequently postponed from June 13, 2022 to June 27, 2022, which is the current scheduled sale date.

5. On this day, Bank of New York filed its presently pending Motion for Relief. As such, the deadline to object to such motion is July 5, 2022.

6. Given this, Bank of New York wishes to postpone its presently scheduled foreclosure to maintain the status quo pending the disposition of the aforementioned Motion for Relief. As this would be the third post-petition postponement, Bank of New York seeks permission of this Court to postpone the June 27, 2022 sale.

Emergency Determination Requested

7. As the foreclosure sale at issue is presently scheduled for June 27, 2022 - five days from the date of this pleading – emergency determination is requested.

WHEREFORE, The Bank of New York Mellon formerly known as The Bank of New York as successor Trustee to JPMorgan Chase Bank, N.A., as Trustee for the Certificateholders of Structured Asset Mortgage Investments II Trust 2006-AR4 Mortgage Pass-Through Certificates, Series 2006-AR4 respectfully requests leave of this Court to postpone its presently scheduled foreclosure sale, and that it be granted such other relief as the Court deems just and proper.

Date: June 21, 2022

Respectfully Submitted,

/s/ Jason J. Giguere

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